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ORIGINAL

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**USWEST**  
life's better here®

**Andrew D. Crain**  
Senior Attorney

May 4, 1999

RECEIVED  
MAY 5 1999  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas, Secretary  
Federal Communications Commission  
The Portals  
445 Twelfth Street S.W.  
Washington, D.C. 20554

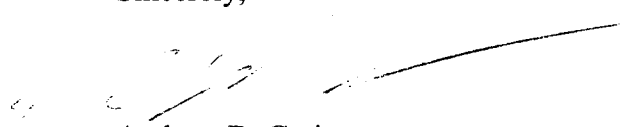
RE: CC Docket No. 98-121

Dear Ms. Salas:

On Thursday, Lynn Notarianni and I, of U S WEST, met with Jake Jennings, Andrea Kearney, David Kirschner and Carol Matthey of the Common Carrier Bureau staff to discuss U S WEST's OSS systems and U S WEST's proposal for OSS testing. Copies of the materials discussed in the meeting are attached.

In accordance with Section 1.1206(a)(2) of the Commission's rules, an original and one copy of this letter and the attachments are being filed with your office for inclusion in the record of this proceeding.

Sincerely,

  
Andrew D. Crain

ADC/jvv  
Enc.

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36 USC 380

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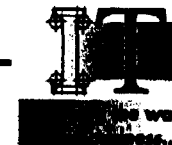
U S WEST

**Checklist Item #2**  
**Operational Support Systems**

## Part 1

❖ BOC has deployed the necessary systems and personnel to provide sufficient access to each of the necessary OSS functions

## Implemented Electronic Interface Functionality



### Resale

#### Function

##### ■ Pre-Ordering

	POTS		Design		UNE Loop		UNE Switch		INP/LNP	
	IMA	EDI	IMA	EDI	IMA	EDI	IMA	EDI	IMA	EDI
Address Verification (incl. rural)	x	x	x	x	x	x	x	x	x	x
Service Availability	x	x	n/a	n/a	n/a	n/a	x	x	n/a	n/a
Customer Service Information	x	x	x	x	x	x	x	x	x	x
Facility Availability	x	x	x	x	x	x	x	x	x	x
Appointment Avail/Reserve	x	x	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Telephone Number Availability	x	x	x	x	n/a	n/a	x	x	n/a	n/a

##### ■ Ordering

Work Order Submission	x	x	x	x	x	x	x	x	x	x
Request/Cancel	x	x	x	x	x	x	x	x	x	x
Store & Retrieve	x	n/a	x	n/a	x	n/a	x	n/a	x	n/a
Supplementals	x	x	x	x	x	x	x	x	x	x
Completed Order Summary Screen	x	x	x	x	x	x	x	x	x	x

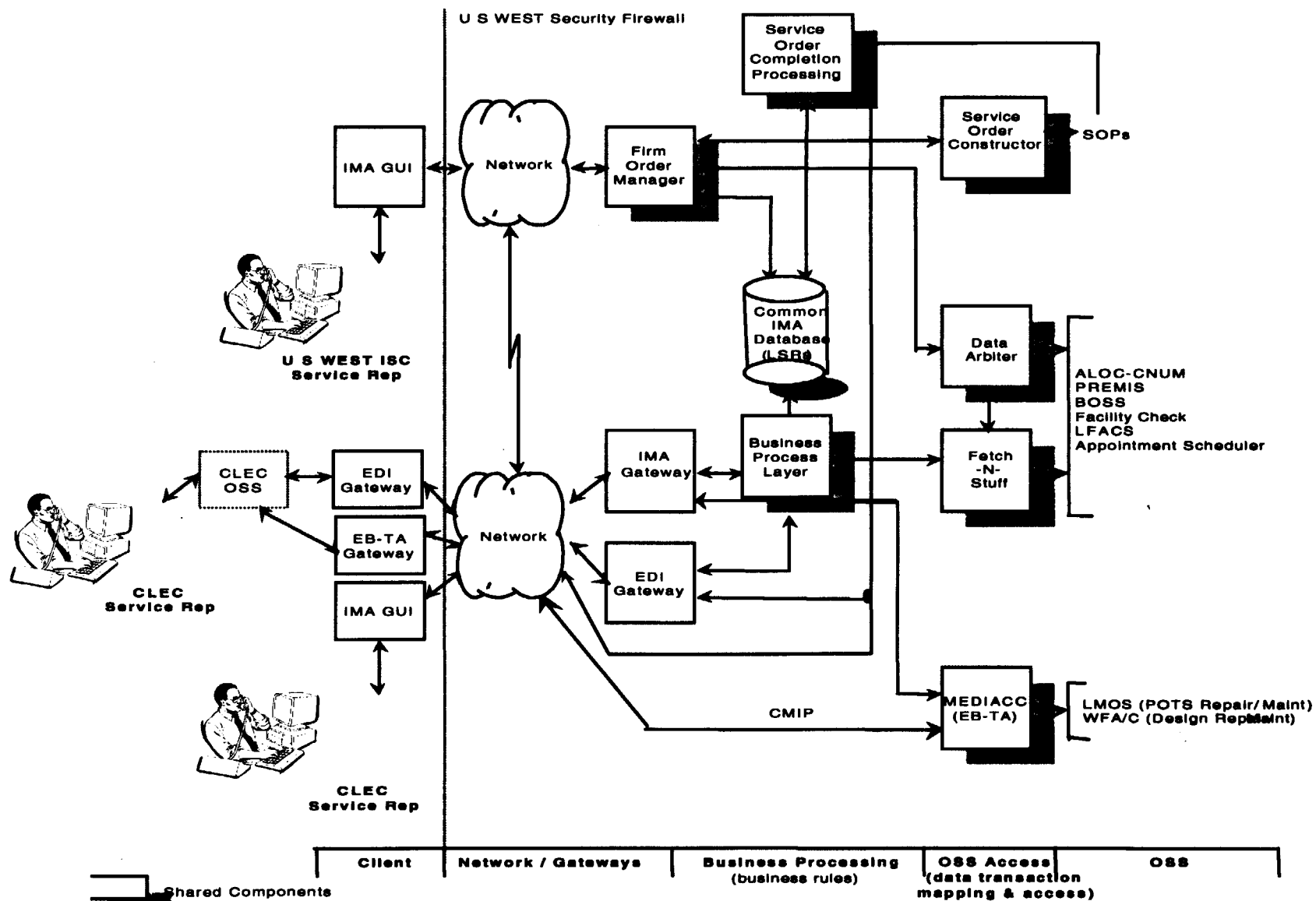
#### Maintenance & Repair

	EB-TA		EB-TA		EB-TA		EB-TA		EB-TA	
Open Trouble Report	x	x	x	x	x	x	x	x	x	x
Cancel Trouble Report	x	x	x	x	x	x	x	x	x	x
Status Trouble Report	x	x	x	x	x	x	x	x	x	x
Modify Trouble Report	x	x	x	x	x	x	x	x	x	x
MLT Testing		x	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a

n/a = not applicable



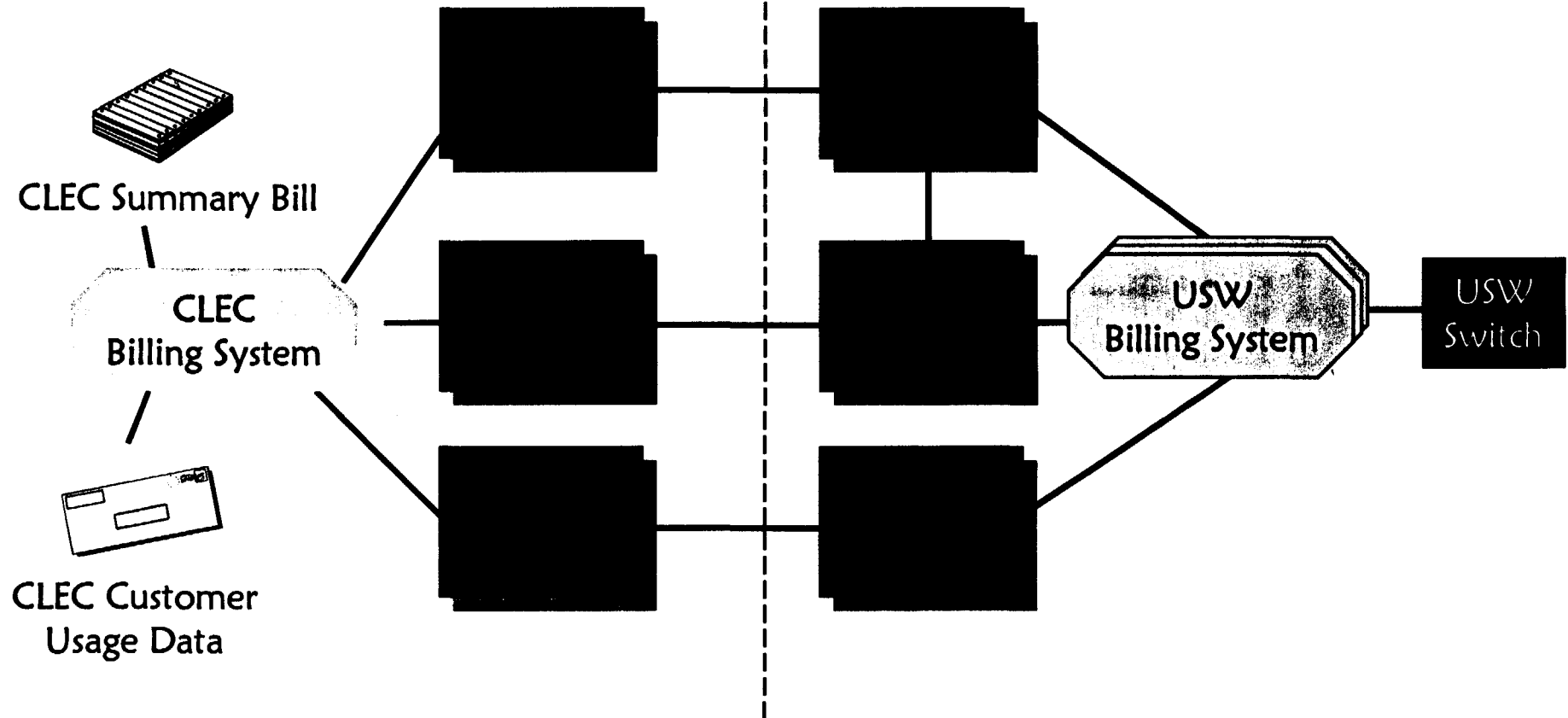
## Mediated Access Architecture





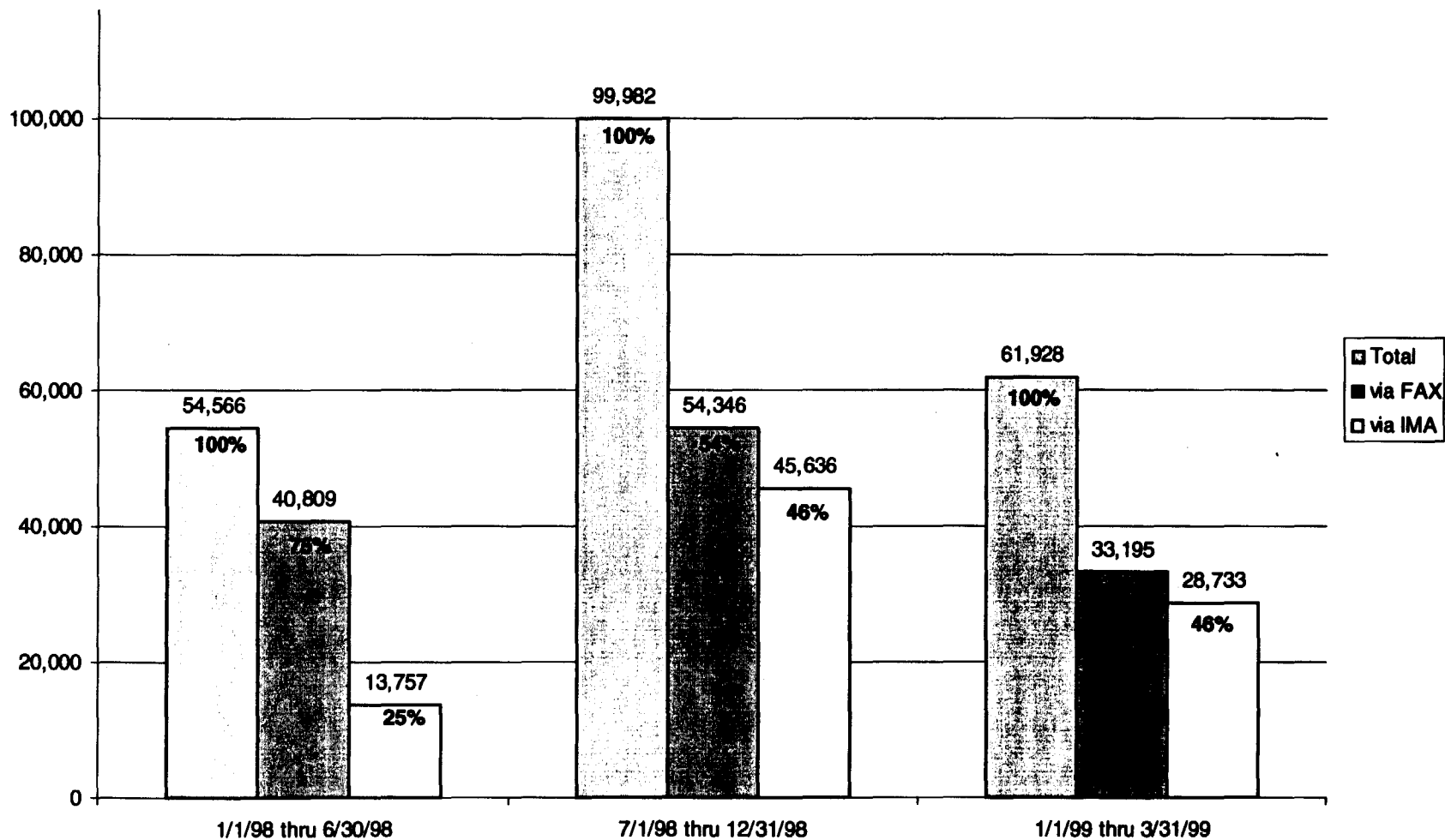
## CLEC Environment

## USW Environment





## 14 State LSR Data





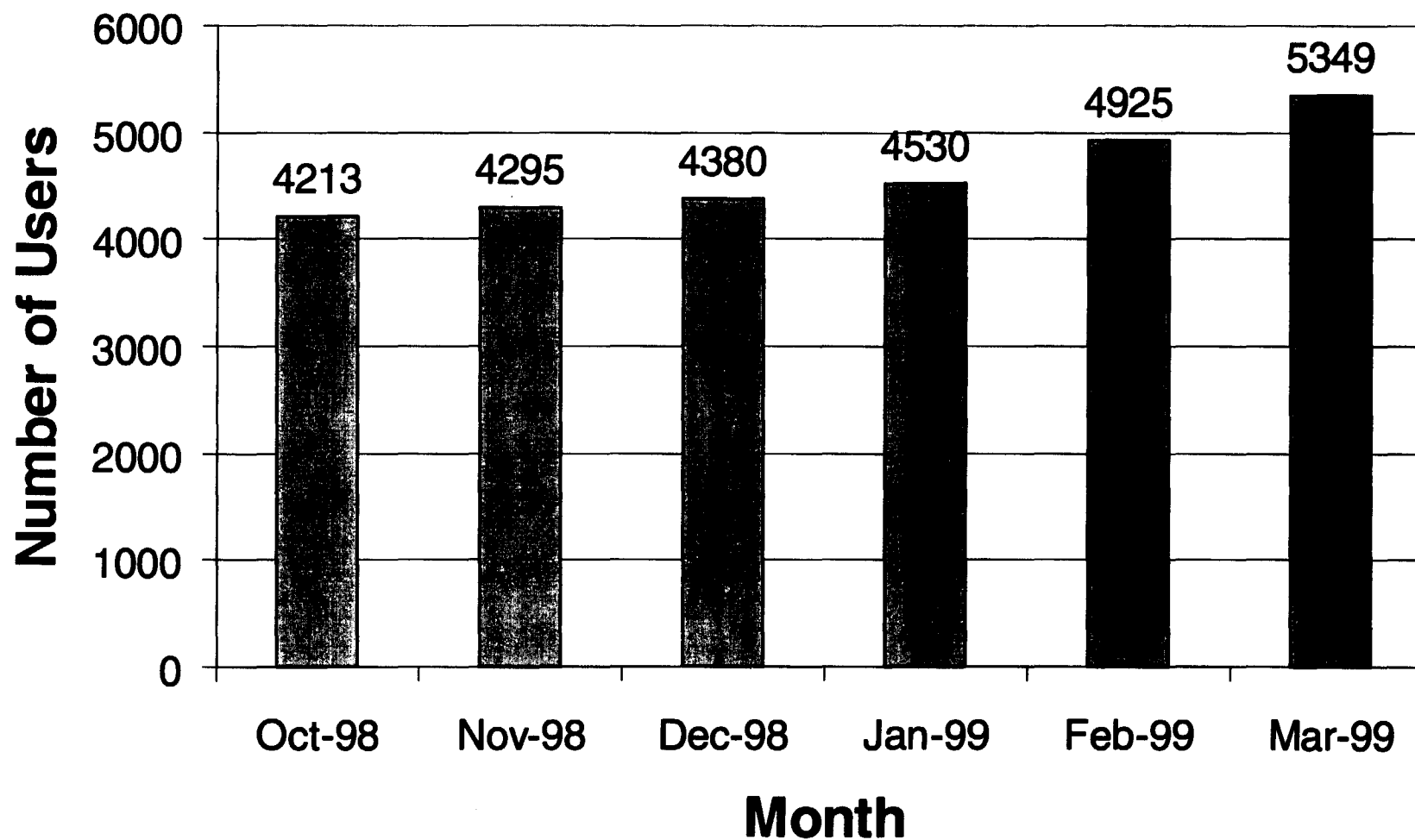
## Electronic Interface Releases

Release 3.0 4/24/98	Release 3.1 6/26/98	Release 3.2 9/25/98	Release 3.3 12/11/98	Release 4.0 3/27/99
<b>EDI:</b> <ul style="list-style-type: none"> <li>• TN Selection &amp; Cancel</li> <li>• Appointment Selection &amp; Cancel</li> </ul> <b>IMA/EDI:</b> <ul style="list-style-type: none"> <li>• FOM Enhancements for EDI</li> <li>• TN &amp; Appointment Return</li> <li>• Design Services &amp; EDI Change Request</li> </ul> <b>Maintenance &amp; Repair:</b> <ul style="list-style-type: none"> <li>• Enhancements</li> </ul> <b>Flow-Through:</b> <ul style="list-style-type: none"> <li>• EDI Conversion-as-is</li> </ul>	<b>EDI:</b> <ul style="list-style-type: none"> <li>• CSR</li> <li>• Facility Availability</li> <li>• Address Validation</li> <li>• Directory Listing</li> <li>• PBX using POTS</li> <li>• Unbundled Loop</li> <li>• Loop w/Number Portability</li> <li>• Service Availability</li> <li>• Service Order Inquiries</li> </ul> <b>Maintenance &amp; Repair:</b> <ul style="list-style-type: none"> <li>• Line Record validation of RSID/MCN</li> </ul> <b>Flow-Through:</b> <ul style="list-style-type: none"> <li>• Conversion-as-Specified for Central</li> </ul>	<b>EDI:</b> <ul style="list-style-type: none"> <li>• Private Line</li> </ul> <b>IMA:</b> <ul style="list-style-type: none"> <li>• Store &amp; Retrieve</li> <li>• Complete order Summary</li> <li>• Number Portability</li> <li>• Descriptive Address Enhancements</li> <li>• Supplemental Processing</li> <li>• Directory Listing</li> <li>• POTS Pre-order &amp; Orders in New GUI</li> </ul> <b>IMA/EDI:</b> <ul style="list-style-type: none"> <li>• Unbundled Analog Line Side Switch Port</li> <li>• ISDN -BRI Non-Design</li> <li>• Y2K Compliance</li> <li>• SAQ &amp; AVQ Enhancements</li> <li>• Directory Advertising Check</li> <li>• Ties between Pre-order &amp; Order</li> <li>• Enhanced Errors &amp; Rejects</li> <li>• RMBK on Address Validation</li> <li>• CSR Management</li> <li>• Hunting Enhancements</li> <li>• LSR Locking</li> </ul> <b>Maintenance &amp; Repair:</b> <ul style="list-style-type: none"> <li>• Text Messaging</li> <li>• Additional Order Info</li> </ul> <b>Flow-Through:</b> <ul style="list-style-type: none"> <li>• Conversion-as-Specified for Eastern &amp; Western</li> <li>• Conversion-as-is for Western</li> </ul>	<b>EDI:</b> <ul style="list-style-type: none"> <li>• Centrex Analog</li> </ul> <b>IMA:</b> <ul style="list-style-type: none"> <li>• POTS PBX</li> </ul> <b>IMA/EDI:</b> <ul style="list-style-type: none"> <li>• Y2K Compliance</li> <li>• Change/rules DSR, DSCR, DL</li> <li>• Expanded FID</li> <li>• Digital Switch port-unbundled ISDN</li> <li>• Duplicate CSR Resolution</li> <li>• Private Line Retrieval by Circuit Id</li> <li>• Manual Jeopardy Status</li> <li>• FAQ Enhancement</li> <li>• AN Repeating FOC</li> <li>• LSR Confirmation edits</li> <li>• HID Added to LSR</li> </ul>	<b>EDI:</b> <ul style="list-style-type: none"> <li>• SSL3 Upgrade</li> <li>• EDI Transaction Table</li> </ul> <b>GUI:</b> <ul style="list-style-type: none"> <li>• Netscape Upgrade to Support Additional Browser Versions</li> </ul> <b>Maintenance &amp; Repair:</b> <ul style="list-style-type: none"> <li>• Modify Trouble Ticket Enhancement</li> <li>• Modify Trouble Ticket Message</li> </ul> <b>Flow Through:</b> <ul style="list-style-type: none"> <li>• POTS Change Orders- All Regions</li> </ul> <b>Common:</b> <ul style="list-style-type: none"> <li>• USOC Edits</li> <li>• Enhanced SAQ w/Wholesale Product Table Integration</li> <li>• Feature Verification</li> <li>• FOM LSR ID on LSR List Screen</li> <li>• Y2K Certification Testing</li> <li>• Reject LSR if CSR in Final</li> <li>• LSRC Save/Restore</li> <li>• Ranges for Ported Numbers</li> <li>• Manual Jeopardy</li> <li>• Reorganization of FOC</li> </ul>



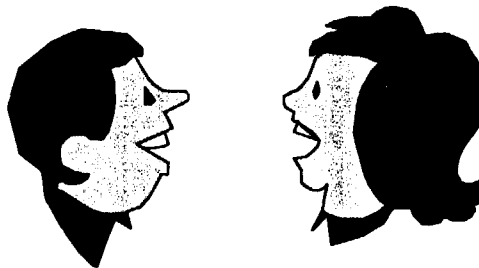


## Total Individual IMA Users



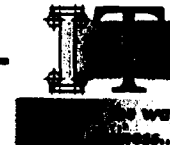
## Part 2

❖the BOC has adequately assisted CLECs to understand how to implement and use all of the OSS functions available to them;





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## CLEC Assistance & Communications

Account Executives  
Technical Implementation Manager  
New Customer Questionnaire  
Computer to Computer Interface Specifications  
Production Readiness Verification  
IMA Training  
Product Training  
IMA User Documentation  
IRRG Documentation, Public DMP, Tariffs  
ISC and System Help Desk  
Release notes  
CLEC User Forum  
Suggestions to Standards Committees

## Part 3

❖OSS functions are operationally ready



# Operational Readiness



## ■ Actual Results

- Meeting Current Demand
- Meeting Reasonably Foreseeable Demand

## ■ Carrier-to-Carrier Testing

- Interoperability Testing
  - ◆ EDI with MCI
  - ◆ EBTA with MCI
  - ◆ EDI with McLeod for Centrex

## ■ Third Party Testing

- HP Capacity Testing
- HP Performance & Stress Testing

## ■ Internal Testing

- Business Integration Testing
- EDI Functionality Testing
- IMA Functionality Testing
- IMA Load Testing
- IMA System Testing



# Acronyms

BOS	Billing Output Specification
BPL	Business Process Layer
CMIP	Common Management Information Protocol
CSR	Customer Service Record
DMP	Document Management Platform
EDI	Electronic Data Interchange
EMR	Exchange Message Record
IMA	Interconnect Mediated Access
IRRG	Interconnect & Resale Resource Guide
LAN	Local Area Network
LSR	Local Service Request
MEDIACC	Mediated Access
WAN	Wide Area Network

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**Solomon D. Trujillo**  
President &  
Chief Executive Officer



April 5, 1999

William E. Kennard, Chairman  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W., Room 8-B201  
Washington, D.C. 20554

Dear Chairman Kennard:

I welcome your willingness to engage in a dialog with U S WEST regarding a collaborative process for evaluation of U S WEST's upcoming 271 applications. Both the Commission and U S WEST appear to recognize that streamlining and expediting the 271 process will result in numerous benefits for consumers, rural America, competitive local exchange carriers, U S WEST and the Commission. Those benefits clearly include:

- Consumers in U S WEST's region will receive the benefits of true long distance competition, including lower prices, the ability to order packages of telecommunications services, and additional choice in providers.
- Because of the rural nature of much of U S WEST's region, U S WEST's entry into the long distance market will accelerate the development of competition and advanced telecommunication services in rural America.
- An expedited collaborative process between the Commission Staff and U S WEST will allow U S WEST to address and remedy any possible concerns of the Staff, thereby verifying that U S WEST has satisfied all obligations to open its territories to competition.
- The Commission Staff and U S WEST can avoid unnecessary delay and preserve scarce resources by identifying all issues before formal proceedings on U S WEST's applications. The parties can avoid the unfortunate history of 271 proceedings, where BOCs have been told to remedy certain issues, only to have additional issues raised in new Commission proceedings.



William E. Kennard, Chairman  
Federal Communications Commission  
April 5, 1999  
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In enacting the Telecommunications Act of 1996, Congress wisely recognized that the competitive landscape would differ from state to state. Congress set up a procedure whereby BOCs would file 271 applications on a state-by-state basis, so that those applications would be evaluated in the unique context of each state. As you know, U S WEST has concluded a hearing on its 271 application before the Public Service Commission of Nebraska and has filed an application before the Arizona Corporation Commission.

U S WEST's Nebraska application is a good example of why the state-specific context is important. Nebraska is not New York. The states are very different, particularly in population density. Consequently, the competitive landscapes of the states are vastly different. That is not to say that competition has not developed in Nebraska. In many ways, competition is more advanced in Nebraska than anywhere else in the nation. Because of Cox Nebraska Telecom's aggressive telephony rollout in Nebraska, over 50% of residential customers in U S WEST's Nebraska territory will soon have a choice between true facilities-based telecommunications providers. U S WEST is also facing vigorous facilities-based competition from Aliant Midwest, an independent local exchange carrier in Nebraska. At the Nebraska hearing, Aliant supported U S WEST's efforts to provide access to OSS.

However, because of the drastic difference in population density and the fact that competition in Nebraska has developed from true facilities-based providers, the absolute number of orders for unbundled network elements and resale that U S WEST has processed in Nebraska is tiny compared to the number of orders that Bell Atlantic has processed in New York. For the same reasons, CLECs are ordering a much greater range of products in New York than they are ordering in Nebraska. Because CLECs in Nebraska have made significant investments in their own facilities, they only order interconnection and unbundled loops from U S WEST. While the number of orders in New York may be expected to increase exponentially in the future, the same level of increase cannot be expected in Nebraska, where true facilities-based competitors are already serving a large part of the residential population.

In recognition of these differences, U S WEST is proposing the attached alternative testing plan, which is also being delivered to Lawrence Strickling. In this proposal, U S WEST outlines a plan for U S WEST to conduct testing of its end-to-end OSS capabilities. Because of the significant differences in the competitive landscape between U S WEST's region and Bell Atlantic's region, U S WEST's plan takes a different approach from the testing that Bell Atlantic is undergoing in New York.

Because there is no reason to anticipate that the volume of CLEC orders will ever increase to a level that U S WEST's current systems could not handle, and because there is no



William E. Kennard, Chairman  
Federal Communications Commission  
April 5, 1999  
Page 3

reason to anticipate that CLECs will ever order from U S WEST many of the products and services they are ordering in New York, U S WEST's proposed testing plan does not include the expensive and time-consuming testing of hypothetical orders and volume levels that Bell Atlantic is undergoing in New York. Instead, U S WEST proposes that its OSS capabilities be tested on the basis of U S WEST's performance in provisioning actual orders. In place of testing of hypothetical orders and volumes, U S WEST proposes a two-tiered structure of defined remedies whereby U S WEST would incur significant financial losses if it fails to adequately provision future demand. U S WEST's defined remedies proposal is a reasonable alternative to New York-style testing, because U S WEST would be at significant financial risk if it did not ensure that its systems and processes could handle any increase or change in demand.

I propose that the Commission Staff and U S WEST begin a collaborative process to implement the alternative testing plan and to identify any issues relating to U S WEST's 271 applications. The purpose of the collaborative process would be to identify for U S WEST all of the issues that could possibly stand in the way of interLATA relief, and to allow U S WEST to resolve any such issues to the satisfaction of the Staff. U S WEST proposes that the process be conducted according to strict timelines designed to lead to approval of U S WEST's 271 applications by September. A copy of U S WEST's proposal is attached.

U S WEST understands that the Commission cannot prejudge U S WEST's 271 application. Nevertheless, U S WEST believes that its proposed process will be fruitful if both U S WEST and the Staff commit to identifying all potential issues relating to U S WEST's applications, and to work constructively to satisfy the Staff's concerns. It is imperative that consumers get the benefit of true competition as soon as possible for all services and that we have the opportunity to compete on equal terms with the mega-companies. I believe we can make this happen in 1999 if we both work to make it happen.

Sincerely,

A handwritten signature in black ink, appearing to read "Sol D. Kelly", written in a cursive style.

## U S WEST'S PROPOSAL FOR OSS TESTING

### Introduction

This document outlines a proposal for U S WEST to conduct testing of its end to end OSS capabilities.

U S WEST has expended substantial funds and extensive time in developing interfaces that provide CLECs access to U S WEST's OSSs for pre-ordering, ordering, provisioning, maintenance and repair, and billing capabilities to enable the CLECs to serve their customers through the use of resold services, unbundled elements and interconnection. In addition to its standards-based EDI interface, U S WEST has developed a robust standards-based GUI interface which offers an easier and less expensive method for CLECs to access U S WEST's OSSs. Additionally, U S WEST has put in place trained work center personnel and processes to assist CLECs and assure the success of their service and repair requests. Despite these efforts, U S WEST has experienced significantly less CLEC order volume than its RBOC counterparts. Correspondingly, the requirement to demonstrate operational readiness of OSS capabilities should reflect the realities of the competitive marketplace in U S WEST's region. The following sections set forth a strategy and plan to test OSS operational readiness based on actual CLEC volumes and request types, with options for remedies should additional volumes or request types be experienced.

In enacting the Telecommunications Act of 1996, Congress wisely recognized that the competitive landscape would differ from state to state. Congress set up a procedure whereby BOCs would file 271 applications on a state-by-state basis, so that those applications would be evaluated in the unique context of each state.

U S WEST's Nebraska 271 application is a good example of why the state-specific context is important. Nebraska is not New York. The states are very different, particularly in population density. Consequently, the competitive landscapes of the states are vastly different. That is not to say that competition has not developed in Nebraska. In many ways, competition is more advanced in Nebraska than anywhere else in the nation. Because of Cox Nebraska Telecom's aggressive telephony rollout in Nebraska, over 50% of residential customers in U S WEST's Nebraska territory will soon have a choice between true facilities-based telecommunications providers. U S WEST is also facing vigorous competition from Aliant Midwest, an independent local exchange carrier in Nebraska.

However, because of the drastic difference in population density and the fact that competition in Nebraska has developed from true facilities-based providers, the absolute number of orders for unbundled network elements and resale that U S WEST has processed in Nebraska is tiny compared to the number of orders that Bell Atlantic has processed in New York. For the same reasons, CLECs are ordering a much greater range of products in New York than they are ordering in Nebraska. Because CLECs in

Nebraska have made significant investments in their own facilities, they only order interconnection and unbundled loops from U S WEST. While the number of orders in New York may be expected to increase exponentially in the future, the same level of increase cannot be expected in Nebraska, where true facilities-based competitors are already serving a large part of the residential population.

In recognition of these differences, U S WEST is proposing an alternative testing plan for U S WEST to conduct testing of its end-to-end OSS capabilities. Because of the significant differences in the competitive landscape between U S WEST's region and Bell Atlantic's region, U S WEST's plan takes a different approach from the testing that Bell Atlantic is undergoing in New York.

Under this proposal, U S WEST would test OSS operational readiness based on actual CLEC volumes and on products that CLECs are actually ordering. U S WEST would use actual results to demonstrate the operational readiness of U S WEST's electronic interfaces, downstream OSSs, and service centers. Success would be based upon statistically significant results to be verified by an independent third party. U S WEST would work with the Commission Staff to identify necessary performance measures. If the testing results meet the required test objectives, U S WEST would be deemed to have satisfied the OSS requirements of Section 271.

Because there is no reason to anticipate that the volume of CLEC orders will ever increase to a level that U S WEST's current systems could not handle, and because there is no reason to anticipate that CLECs will ever order from U S WEST many of the products and services they are ordering in New York, there is no need for U S WEST to undergo the expensive and time-consuming testing of hypothetical orders and volume levels that Bell Atlantic is undergoing in New York. In place of such testing, U S WEST proposes a two-tiered defined remedy structure. If U S WEST is not able to adequately provision an increase or change in demand, as determined by agreed-upon performance measures, then defined remedies would be enforced. At first, the defined remedies would be set at a moderate level. If, however, U S WEST cannot cure the situation in a specified timeframe (such as 90 days), then the defined remedies would escalate to a level which would have a significant financial impact on U S WEST.

U S WEST's defined remedies proposal is a reasonable alternative to New York-style testing, because U S WEST would be at significant financial risk if it did not ensure that its systems and processes could handle any increase or change in demand.

### **Goal**

The goal of testing would be to demonstrate the operational readiness of U S WEST's electronic interfaces, downstream OSSs, and service centers to accept, provision, bill, and/or repair CLEC production requests for a pre-defined set of products. The test results would be sufficient to support a successful 271 filing.

### **Testing Strategy**

U S WEST proposes a testing strategy that is primarily based on actual results of CLEC order and repair requests and would exclude products for which there is little or no demand. Success would be based upon the implementation of a test process that would produce statistically significant results to be verified by an independent third party. U S WEST would employ certain of its currently defined external measures as well as define and collect other necessary internal data in support of the testing activities. If the testing results meet the required test objectives, U S WEST would be deemed to have satisfied the OSS requirements of Section 271.

### **Test Structure and Governance**

Operational readiness testing would be conducted internally by U S WEST with participation by an independent third party. U S WEST would assign a Test Manager responsible for overall test implementation and management. The Test Manager would lead a multidisciplinary team consisting of representatives from the U S WEST wholesale & retail organizations that perform the involved processes. An independent third party would be responsible for monitoring all testing and results production to assure objectivity in accordance with the test plan. This would include but not be limited to review of test procedures and metrics, and the preparation of a formal attestation regarding the test results.

## **Description of Test Plan**

The test plan is described in the following three sections:

- Section I: This section outlines the test plan for products currently being ordered by CLECs, and reasonably anticipated to be ordered by CLECs in significant volumes. This section includes the identification of the products and interfaces to be tested, the transaction types, the test criteria, and a two-tiered remedy structure for non-compliance.
- Section II: This section outlines the test plan for products for which U S WEST has or will provide OSS capabilities, but for which there is little or no actual CLEC order volume. This section includes the identification of the products, the interfaces to be tested, the transaction and order types, the test criteria, and a two-tiered structure of remedies for non-compliance.
- Section III: This section outlines the products for which there is little or no actual CLEC order volume and where no current mechanized capabilities exist. U S WEST will use manual processes to provision these products, should CLECs order them. If sufficient volume is experienced or forecasted, then U S WEST will mechanize these processes. No OSS testing would be required or performed at this time. Testing of these products would involve verification by the third party that U S WEST has manual processes. This section includes identification of the products and a two-tiered structure of remedies.

## ***SECTION I***

**Representative Product Set:** The following list represents those products for which U S WEST would provide OSS test results based on actual commercial usage.

- Resale POTS - Residence
- Resale POTS - Business
- Resale Private Line Transport
- Resale ISDN – BRI
- Resale ISDN - PRI
- Resale PBX Trunks
- Unbundled Loops - Analog
- Interim Number Portability
- Local Number Portability
- Interconnection Trunks
- Resale Frame Relay
- Unbundled Element Combination Conversions
- Unbundled Loop - DSL Capable

**Electronic Interfaces:** The following electronic interfaces support one or more of the products identified above and may be involved in the test.

- Interconnection Mediated Access - Electronic Data Interchange (IMA-EDI)
- Interconnection Mediated Access - Graphical User Interface (IMA-GUI)
- Electronic Bonding Trouble Administration (EB-TA)
- Exchange Access and Control Tracking (EXACT)
- Customer Record Information System - Electronic Data Interchange (CRIS-EDI)
- Interexchange Carrier Access Billing System - Billing Output Specification (IABS-BOS)
- Exchange Message Interface (EMI)
- Completion & Loss Notification

Transaction Types: The proposed testing would cover the following capabilities where relevant to the product type and electronic interfaces listed:

- Pre-ordering
- Ordering
- Provisioning
- Billing
- Maintenance & Repair
- Listings
- E911
- Numbering Assignment
- Usage Reporting
- Summary Billing
- Completion & Loss Reporting
- CLEC Assistance

Test Criteria: Since there are commercial ordering volumes for the products identified in this section, test criteria would primarily be gathered based on the performance indicators data resulting from the actual requests. The independent third party would be responsible for monitoring all testing and results production to assure objectivity in accordance with the test plan. These measures would demonstrate U S WEST's ability to handle actual capacity and demonstrate the accuracy and completeness of the service to CLECs. Because of the defined remedies section of this plan, U S WEST would bear the financial risk of being able to adequately provision any increase in demand. U S WEST may also provide existing third-party, carrier-to-carrier and internal test to further support operational readiness. Examples would include but are not limited to internal system and business integration test results.

Performance Measurements: U S WEST would provide relevant performance indicators within the following categories:

- Gateway Availability
- Pre-ordering
- Ordering & Provisioning
- Maintenance & Repair
- Billing
- Emergency Services
- Directory Assistance
- Operator Services
- Network Interconnection

U S WEST would work with the Commission Staff to identify and develop the performance indicators to be included in the test.

Remedies: Extensive testing is not required for the above set of products because performance measurement results based on commercial usage would demonstrate U S WEST's compliance. U S WEST has developed order flowthrough capabilities for certain product types and order scenarios and continues to enhance the systems to support additional order flowthrough. U S WEST would bear significant financial risk should volumes significantly increase to the extent that system capabilities cause performance measurement targets to be missed. U S WEST proposes a two-tiered system of automatic defined remedies. If U S WEST fails to meet defined targets, remedies would be automatically assessed. If U S WEST does not achieve acceptable levels of performance in a defined timeframe (such as 90 days), automatic remedies would increase so significantly that U S WEST's only prudent course of action would be immediate compliance. U S WEST would work with the Commission Staff to define the appropriate remedies.



## **SECTION II**

**Representative Product Set:** The following list represents those products for which U S WEST has developed or is developing OSS capabilities but for which there is little or no CLEC order volume.

- Unbundled Dedicated Interoffice Transport
- Shared Transport
- Unbundled Loops - Digital
- Unbundled Switch Port - Analog
- Unbundled Vertical Features
- Unbundled Switch Port - Digital Line Side
- Unbundled Digital Trunk Port
- Unbundled Direct Interoffice Transport - OCN
- Extended Unbundled Direct Interoffice Transport
- Interconnection - Transit Traffic

**Electronic Interfaces:** The following electronic interfaces support one or more of the products identified above and may be involved in the testing.

- Interconnection Mediated Access - Electronic Data Interchange (IMA-EDI)
- Interconnection Mediated Access - Graphical User Interface (IMA-GUI)
- Electronic Bonding Trouble Administration (EB-TA)
- Exchange Access and Control Tracking (EXACT)
- Customer Record Information System - Electronic Data Interchange (CRIS-EDI)
- Interexchange Carrier Access Billing System - Billing Output Specification (IABS-BOS)
- Exchange Message Interface (EMI)
- Completion & Loss Notification

**Transaction Types:** The proposed testing would cover the following capabilities, where relevant to the product type and electronic interfaces listed:

- Pre-ordering
- Ordering
- Provisioning
- Billing
- Maintenance & Repair
- Listings
- E911
- Numbering Assignment

- Usage Reporting
- Summary Billing
- Completion & Loss Reporting
- CLEC Assistance

Test Criteria: Since there are no current commercial ordering volumes for the products identified in this section, there would be minimal performance indicator data relevant to this product set. Because of the defined remedies section of this plan, U S WEST would bear the financial risk of being able to adequately provision these products if demand develops. Test results would include internal test data as reviewed and validated by the independent third party. The following internal test data would be included as applicable:

- Carrier to Carrier Testing - Test results verify that the electronic interfaces meet compatibility requirements between U S WEST and the CLEC. This type of testing includes but is not limited to testing the communications protocol, functional interoperability testing, and certification testing.
- System Testing - Test results establish that the system meets the desired level of stability and functional accuracy prior to deployment of new functionality. This testing also incorporates internal regression and interoperability testing.
- Business Integration Testing - Test results demonstrate overall end-to-end business functionality across the electronic interfaces and downstream OSSs. Testing is generally performed on a product basis and demonstrates a level of business capability in a production environment.
- Capacity Testing – Test results demonstrate that the electronic interfaces or OSS are capable of handling a sustained transaction rate over varying study hours.
- Process Review & Inspection –Test results demonstrate that sufficient processes are defined, implemented and routinely used to achieve performance results. These results typically support process tasks and documents developed to provide CLEC assistance.
- Relevant Performance Indicators - Certain performance indicators such as Systems Availability may be applicable and relevant regardless of lack of commercial usage.

Remedies: Test results as defined above would demonstrate U S WEST compliance. Should U S WEST begin to experience significant order volumes for any of the products listed, performance indicators as described in Section I would automatically determine compliance. U S WEST would bear significant financial risk should volumes significantly increase to the extent that lack of system functionality or other capabilities cause performance measurements to not be met. U S WEST proposes a two-tiered system of automatic defined remedies. If U S WEST fails to meet defined targets, remedies would be automatically assessed. If U S WEST does not achieve acceptable levels of performance in a defined timeframe (such as 90 days), automatic remedies would increase so significantly that U S WEST's only prudent course of action would be immediate compliance. U S WEST would work with the Commission Staff to define the appropriate remedies.

### **SECTION III**

**Representative Product Set:** The following list represents products for which there is little or no current CLEC ordering volumes and which U S WEST will support through manual processes.

- Unbundled Customer Controlled Rearrangement Element
- Unbundled Tandem Switching
- Customized Routing
- Unbundled Common Channel Signaling
- Unbundled AIN

**Test Criteria:** Because of the defined remedies section of this plan, U S WEST would bear the financial risk of being able to adequately provision these products if demand develops. Test results would also include verification by a third party that U S WEST has processes in place to support these products.

**Remedies:** Test results as defined above would demonstrate U S WEST compliance. Should U S WEST begin to experience significant order volumes for any of the products listed, performance indicators as described in Section I would automatically determine compliance. U S WEST would bear significant financial risk should volumes significantly increase to the extent that lack of system functionality or other capabilities cause performance measurements to not be met. . U S WEST proposes a two-tiered system of automatic defined remedies. If U S WEST fails to meet defined targets, remedies would be automatically assessed. If U S WEST does not achieve acceptable levels of performance in a defined timeframe (such as 90 days), automatic remedies would increase so significantly that U S WEST's only prudent course of action would be immediate compliance. U S WEST would work with the Commission Staff to define the appropriate remedies.

## **U S WEST'S PROPOSAL FOR COLLABORATIVE PROCESS REGARDING ITS 271 APPLICATIONS**

U S WEST respectfully submits this proposal for a collaborative process between U S WEST and the Commission Staff for evaluation of U S WEST's applications under Section 271 of the Telecommunications Act of 1996. By submitting this proposal, U S WEST is seeking a more expedited and efficient process for 271 consideration. Such a process would serve to promote competition, benefit rural America and preserve Commission resources. The clear benefits of this proposal include:

- Consumers in U S WEST's region will receive the benefits of increased long distance competition, including lower prices, the ability to order packages of telecommunications services, and additional choice in providers.
- Because of the rural nature of much of U S WEST's region, U S WEST's entry into the long distance market will accelerate the development of competition and advanced telecommunication services in rural America.
- An expedited collaborative process between the Commission Staff and U S WEST will allow U S WEST to address and remedy any possible concerns of the Staff, thereby verifying that U S WEST has satisfied all obligations to open its territories to competition.
- The Commission Staff and U S WEST can avoid unnecessary delay and preserve scarce resources by identifying all issues before formal proceedings on U S WEST's applications. The parties can avoid the unfortunate history of 271 proceedings, where BOCs have been told to remedy certain issues, only to have additional issues raised in new Commission proceedings.

U S WEST proposes that the Commission Staff and U S WEST begin a collaborative process to identify any issues relating to U S WEST's 271 applications. The purpose of the collaborative process would be to identify for U S WEST all of the issues that could possibly stand in the way of interLATA relief, and to allow U S WEST to resolve any such issues to the satisfaction of the Staff. We understand that such a process will require a commitment of significant time and resources from the Staff. To alleviate the work load to the extent possible, U S WEST will identify for the Staff before any meeting on a particular checklist item all potential issues relating to U S WEST's satisfaction of the checklist item, along with an explanation of U S WEST's position on each issue identified.

U S WEST proposes that the process be conducted according to strict timelines designed to lead to approval of U S WEST's 271 applications by September. To accomplish this goal, the parties should collaborate with regard to only the most contentious issues (possibly Checklist Item 1 – Interconnection; Checklist Item 2 – Access to Unbundled Elements, including OSS; performance measures; and other known possible issues).

U S WEST proposes that the collaborative process be conducted pursuant to the attached timetable. U S WEST recognizes that the dates it proposes are very compressed and that this proposal will require a significant amount of work in a short period of time from both U S WEST and the Commission Staff. If the Staff has any alternative suggestions, U S WEST will gladly consider any such proposals. In developing such alternatives, please keep in mind that the overall timeframe is extremely important to U S WEST.

U S WEST understands that the Commission cannot prejudge U S WEST's 271 application, and U S WEST is not asking for any commitments from the Commission. However, for this process to be fruitful, the Commission Staff must commit to attempt to identify all possible issues relating to U S WEST's applications, and to indicate what plans for resolution with defined remedies would be acceptable, providing of course that no additional evidence is developed in the proceedings on U S WEST's application. If the Commission Staff agrees to work to achieve these goals, U S WEST will work to address the Staff's concerns.

To accomplish the timeline proposed by U S WEST, the parties need to begin work very soon. Consequently, U S WEST respectfully requests that the Staff respond as soon as possible regarding whether it would agree to such a process, and regarding whether the accompanying OSS testing plan is an acceptable approach.

## **U S WEST TIMELINE**

- March 10 – U S WEST delivered the Arizona SGAT to Commission Staff and asked for comments;
- March 26 – U S WEST to deliver to the Commission Staff complete copies of its prefiled testimony in Arizona and Nebraska, along with the transcript of the Nebraska hearing;
- April 2 – U S WEST to confer with the Commission Staff to identify any possible issues relating to interconnection and performance measures;
- April 7 – U S WEST to confer with the Commission Staff to identify any possible issues relating to unbundled network elements, including OSS;
- April 9 – meeting between U S WEST and Commission Staff regarding interconnection and performance measures;
- April 14 – meeting between U S WEST and Commission Staff regarding unbundled network elements, including OSS;
- April 14 – U S WEST to confer with the Commission Staff to identify any remaining known issues;
- April 21 – meeting between U S WEST and Commission Staff regarding remaining known issues;
- April 26 – Commission Staff to confer with U S WEST and identify all concerns it has relating to U S WEST's 271 applications, as well as all steps U S WEST must take to obtain the Staff's support in the applications;
- May 5 – U S WEST to confer with Commission Staff and propose plans to resolve each issue, along with proposed defined remedies;
- May 12-14 – meetings between U S WEST and Commission Staff to produce agreed-upon plans with defined remedies for U S WEST to resolve each issue; and
- June 1 – U S WEST files its application.